

ALEX G. TSE (CABN 152348)
Acting United States Attorney

BARBARA J. VALLIERE (DCBN 439353)
Chief, Criminal Division

MICHAEL G. PITMAN (DCBN 484164)
Assistant United States Attorney, Tax Division
150 Almaden Boulevard, Suite 900
San Jose, CA 95113
Telephone: (408) 535-5040
Facsimile: (408) 535-5081
Email: michael.pitman@usdoj.gov

Attorneys for United States of America

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

JOSE SANCHEZ FLORES,

Defendant.

Case No. 5:17-cr-00506-BLF

STIPULATION AND ~~PROPOSED~~ ORDER
EXCLUDING TIME

The Defendant Jose Sanchez Flores and the government, by and through undersigned counsel, appeared before the Court on June 12, 2018 at 9:00 AM for a status conference. The matter was continued to July 17, 2018 at 9:00 AM for a status conference. Counsel for the Defendant requested that time be excluded under the Speedy Trial Act between June 12, 2018 and July 17, 2018 in order to review discovery and conduct necessary investigation. The government has no objection.

Accordingly, Defendant and the United States hereby STIPULATE and AGREE that time under the Speedy Trial Act be excluded from June 12, 2018 and July 17, 2018 pursuant to 18 U.S.C. §§ 3161(h)(7)(A) and (B)(iv) to allow for effective preparation of counsel, taking into account the exercise of due diligence.

Respectfully submitted,

ALEX G. TSE
Acting United States Attorney

s/ Michael G. Pitman
MICHAEL G. PITMAN
Assistant United States Attorney

Attorneys for United States of America

s/ Natalie Nabizada
NATALIE NELOFAR NABIZADA
The Litigation Law Group
111 N Market St., Suite 1010
San Jose, CA 95113
(949) 656-1530
Email: natalien@thellg.com

Attorney for Defendant Jose Sanchez Flores

~~[PROPOSED]~~ ORDER

Pursuant to the Stipulation of Defendant Jose Sanchez Flores and the United States, the representations of counsel, and for good cause shown, the Court finds that failing to exclude the time between June 12, 2018 and July 17, 2018 would unreasonably deny Defendant continuity of counsel and would deny counsel the reasonable time necessary for effective preparation, taking into account the exercise of due diligence. 18 U.S.C. § 3161(h)(7)(B)(iv). The Court further finds that the ends of justice served by excluding the time between June 12, 2018 and July 17, 2018 from computation under the Speedy Trial Act outweigh the best interests of the public and the defendant in a speedy trial. Therefore, IT IS HEREBY ORDERED that the time between June 12, 2018 and July 17, 2018 shall be excluded from computation under the Speedy Trial Act. 18 U.S.C. § 3161(h)(7)(A) and (B)(iv).

DATED: RECEIVED


THE HONORABLE BETH LABSON FREEMAN
UNITED STATES DISTRICT JUDGE